



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 9, 2020

BY ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Re: *United States v. Stephen M. Calk*, 19 Cr. 366 (LGS)

Dear Judge Schofield:

The Government respectfully writes to provide an update with respect to the Government's review of additional recently discovered materials from the Special Counsel's Office ("SCO").

As the Government informed the Court on October 9, 2020 (Dkt. 110), the Government has completed its own manual review and production of additional SCO documents, following the Government's discovery of previously unproduced SCO documents as detailed in the Government's August 7, 2020 letter (Dkt. 96). The Government continues, as described in its October 9 letter, to attempt to double-check these productions through an automated deduplication process.

While the Government anticipated that the automated deduplication process would take approximately 30 days, the Government writes to update the Court that unfortunately, it is not yet complete. In particular, since the Government last updated the Court, while the Government's outside vendor has loaded substantially all of the relevant documents into its database, the comparison process (which involves an automated process of document comparison and then a manual analysis of the results) has just begun and will require additional time to complete. The delay was due to the format in which the Government obtained these productions from the SCO, which resulted in the data taking substantially longer than anticipated to load and process. However, given that the loading is now substantially complete, the Government does expect to be able to complete this process within the next 30 days.

As noted in the Government's October 9 letter, the Government does not expect this process to result in the production of any significant volume of new material (and, to the contrary, believes it may result in confirmation that some of the material already produced after the manual review had in fact been previously produced in discovery). The Government intends

to advise the defense and the Court when this process is complete, which, as noted above, the Government presently expects to be within 30 days.

Respectfully submitted,

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cc: Counsel of Record (via ECF)